

1 Chad C. Butterfield, Esq.
Nevada Bar No. 010532
2 **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**
6689 Las Vegas Blvd. South, Suite 200
3 Las Vegas, Nevada 89119
(702) 727-1400; FAX (702) 727-1401
4 chad.butterfield@wilsonelser.com
Attorneys for Defendant
5 *Bank of America, N.A.*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LKIMMY INC. a Nevada corporation,
9 Plaintiff,

10 v.

11 BANK OF AMERICA, N.A., a national banking
association; IL KIM aka JULIUS KIM, an
12 individual; DOES I through X; and ROE
BUSINESS ENTITIES I through X; inclusive,
13 Defendants.
14

Case No.: 2:20-cv-02184-RFB-VCF

**STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME FOR BANK
OF AMERICA, N.A. TO FILE REPLY IN
SUPPORT OF MOTION TO DISMISS
(First Request)**

15 Defendant BANK OF AMERICA, N.A. (“BANA”) and Plaintiff LKimmy, Inc. (“Plaintiff”),
16 by and through their respective counsel of record, hereby stipulate and agree to extend the deadline
17 for BANA to file a reply in support of BANA’s motion to dismiss, filed on December 7, 2020 (ECF
18 No. 4). The deadline for BANA to file its reply brief is currently set for January 12, 2021. The
19 parties hereby stipulate to extend the deadline for BANA to file its reply brief by fourteen (14) days,
20 up to and including January 26, 2021.

21 This stipulation is submitted in compliance with LR IA 6-1. Counsel for BANA requests the
22 proposed extension due to its counsel’s schedule obligations and to ensure sufficient time for counsel
23 for BANA to obtain input from BANA as to the facts and arguments set forth therein. Accordingly,
24 the parties respectfully submit that the proposed extension is supported by good cause.

25 ///

26 ///

27 ///

28 ///

1 The parties agree that the requested extension is not being requested in bad faith or to delay
2 these proceedings unnecessarily.

3 This is the first stipulation for extension of time to file a reply brief.

4 DATED this 11th day of January, 2021.

5 **WILSON, ELSE, MOSKOWITZ,**
6 **EDELMAN & DICKER LLP**

7 /s/ Chad C. Butterfield
8 CHAD C. BUTTERFIELD
9 Nevada Bar No. 10532
10 6689 Las Vegas Blvd. South, Suite 200
11 Las Vegas, Nevada 89119
12 *Attorneys for Defendant*
13 *Bank of America, N.A.*

14 DATED this 11th day of January, 2021.


15 **HONG & HONG LAW OFFICES**

16 /s/ Joseph Y. Hong
17 JOSEPH Y. HONG, ESQ.
18 Nevada Bar No. 5092
19 1980 Festival Plaza Dr., Suite 650
20 Las Vegas, NV 89135
21 *Attorney for Plaintiff LKimmy, Inc.*

22 **ORDER**

23 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

24 Dated this 11th day of January, 2021.

25 
26 **RICHARD E. BOULWARE, II**
27 **United States District Court**
28